

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ALEX GOLDFARB,

Plaintiff,

v.

CHANNEL ONE RUSSIA

Defendant.

Case No. 1:18-cv-08128 (JPC)

ORAL ARGUMENT REQUESTED

**NOTICE OF CHANNEL ONE RUSSIA'S
MOTION FOR SUMMARY JUDGMENT ON ALL CLAIMS**

PLEASE TAKE NOTICE that, pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant Channel One Russia hereby presents this motion for summary judgment on the basis that there is no genuine dispute as to any material fact and Defendant is entitled to judgment as a matter of law. In particular, Plaintiff cannot satisfy his burden to show, by clear and convincing evidence, falsity or actual malice. Summary judgment is also warranted on Defendant's counterclaim. This motion is made and based on this Notice of Motion, the annexed Local Rule 56.1 Statement of Material Facts, the Memorandum of Law filed concurrently in support hereof, the Declaration of Larisa A. Nasonova filed herewith, the Declaration of Timur Siraziev filed herewith, and the Declaration of Kendall E. Wangsgard (with exhibits 1-23) filed herewith, and such pleadings, records and files of this Court and on such further oral and documentary evidence and arguments as may be presented to the Court.

Defendant Channel One Russia respectfully requests oral argument on the motion.

Date: May 31, 2022
Washington, D.C.

Respectfully submitted,

/s/ David B. Rivkin, Jr.
David B. Rivkin, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2022, a copy of the foregoing *Notice of Channel One Russia's Motion for Summary Judgment*, the Memorandum of Law in support thereof, and supporting materials were filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ David B. Rivkin, Jr.
David B. Rivkin, Jr